

Greetings:

I urge the EPA to add resistance management strategies to the decision making process when considering justification for granting emergency exemption use of pesticides. Many of the newer pesticides have more targeted modes of action, which often makes them safer for use. However, this inherent characteristic also exerts considerable selection pressure that threatens the useful life of those improved chemistries. Efforts to increase the number of chemistries available to growers for the purpose of resistance management needs to receive considerable weight in the decision making process. Indeed, the need for resistance management should be justification enough to grant emergency use exemption in some situations.

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